



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AFM
F. #2016R02228

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 30, 2020

By Email and ECF

Andrew J. Frisch
Schlam Stone & Dolan LLP
26 Broadway
New York, NY 10004

Re: United States v. Aleksandr Zhukov
Criminal Docket No. 18-633 (S-1) (EK)

Dear Mr. Frisch:

The government provides supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which has been pre-marked as government exhibits in advance of trial:

- **GX 411, 411A, 412, and 413:** account records from Digital Ocean received earlier this week in response to a trial subpoena;
- **GX 415, 416, 417, and 418:** screenshots of publicly-available archives of the websites adw0rd.com, centbycent.com, mathete.com, and mediamethane.com, obtained earlier today;
- **GX 640 and 640T:** a pdf duplicate of one of the emails Bates-numbered ZHU006609 previously produced to you on September 29, 2020, and its translation;
- **GX 674, 674T, 675, and 675T:** excerpts from the device extraction Bates-numbered ZHU000272 previously produced to you on June 11, 2019, and their translations;
- **GX 803B:** account information for one of the defendant's websites;
- **GX 804A, 807A, 809C, 809D, 809E, 809F, and 814A:** subscriber information for the defendant's co-conspirators and associates; and
- **GX 347:** bank records for the Integra Games Ltd account at Hellenic Bank Public Company Limited in Cyprus and a certification, pursuant to which the government intends to offer this document, see 18 U.S.C. § 3505.

These materials are being made available to you via secure file transfer. They have also been sent in hard-copy form to Mr. Zhukov at the Metropolitan Detention Center.

In addition, the government hereby provides notice of a substitute expert. On January 27, 2020, the government provided notice of its intent to call SH as an expert to testify regarding terminology and technical background information related to the internet, computers, servers, Internet Protocol (“IP”) addresses, website domains, registries, geolocation of computers on the internet, online communications platforms, online advertising, and other concepts referenced in communications by the defendant and his co-conspirators and material to the charges against the defendant. At the same time, the government reserved the right to call substitute expert witnesses. See ECF No. 77. SH is located outside of New York State and is no longer available to travel to New York to testify at trial. In his place, the government intends to call JD, an individual who resides and works in the vicinity of New York City. A copy of JD’s curriculum vitae is enclosed as 3500-JD-1.

Very truly yours,

SETH D. DUCHARME
Acting United States Attorney

By: /s/
 Saritha Komatireddy
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Enclosures

cc: Clerk of the Court (EK) (by ECF) (without enclosures)